

1 ROB BONTA
Attorney General of California
2 R. MATTHEW WISE
Supervising Deputy Attorney General
3 ANNA FERRARI
CHRISTINA R.B. LÓPEZ
4 Deputy Attorneys General
JOHN D. ECHEVERRIA
5 Deputy Attorney General
State Bar No. 268843
6 455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
7 Telephone: (415) 510-3479
Fax: (415) 703-1234
8 E-mail: John.Echeverria@doj.ca.gov
9 *Attorneys for Defendant Rob Bonta,*
in his official capacity

10
11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
13 WESTERN DIVISION
14

15 **STEVEN RUPP; STEVEN**
16 **DEMBER; CHERYL JOHNSON;**
17 **MICHAEL JONES; CHRISTOPHER**
18 **SEIFERT; ALFONSO VALENCIA;**
TROY WILLIS; and CALIFORNIA
RIFLE & PISTOL ASSOCIATION,
INCORPORATED,

19 Plaintiffs,

20 v.

21 **ROB BONTA, in his official capacity**
22 **as Attorney General of the State of**
California; and DOES 1-10,

23 Defendants.
24
25
26
27
28

Case No. 8:17-cv-00746-JLS-JDE

**STIPULATION AND JOINT
REQUEST TO CONTINUE
PRETRIAL DEADLINES**

Courtroom: 8A
Judge: Hon. Josephine L. Staton
Trial Date: None set
Action Filed: April 24, 2017

1 Pursuant to Federal Rule of Civil Procedure 16(b)(4) and Local Rule 7-1,
2 Plaintiffs Steven Rupp, Steven Dember, Cheryl Johnson, Michael Jones,
3 Christopher Seifert, Alfonso Valencia, Troy Willis, Dennis Martin, and the
4 California Rifle & Pistol Association, Incorporated (collectively “Plaintiffs”), and
5 Defendant Rob Bonta, in his official capacity as Attorney General of the State of
6 California (“Defendant”) (together with Plaintiffs, the “Parties”), through their
7 respective attorneys of record, hereby stipulate and request as follows:

8 WHEREAS, the Parties have filed respective motions for summary judgment,
9 Dkt. 149, 150;

10 WHEREAS, on September 8, 2023, the Court heard argument on the Parties’
11 motions for summary judgment and took the motions under submission, Dkt. 160;

12 WHEREAS, the Parties requested a continuance of certain pretrial deadlines
13 by approximately two months, Dkt. 164, which the Court granted, Dkt. 166;

14 WHEREAS, the current scheduling order provides that the deadline to file
15 motions in limine is set for December 12, 2023, and the Final Pretrial Conference is
16 set for January 12, 2024, at 10:30 a.m., Dkt. 166;

17 WHEREAS, the granting of either of the Parties’ motions for summary
18 judgment would fully resolve all claims in this action and render moot existing
19 pretrial deadlines;

20 WHEREAS, any other decision of the Court on the pending motions for
21 summary judgment may provide helpful guidance to the Parties in preparing their
22 pretrial documents, including by narrowing the issues of law and fact for trial;

23 WHEREAS, the Parties have met and conferred on the need to continue the
24 pretrial deadlines and agree that it is in the best interest of the Parties and the Court
25 to further continue the pretrial deadlines; and

26 WHEREAS, the Parties agree that good cause exists to continue the pretrial
27 deadlines by an additional period of approximately sixty (60) days;
28

1 NOW, THEREFORE, the parties hereby stipulate and jointly request that:

2 1. The Court continue the deadline to file motions in limine currently set for
3 December 12, 2023, to February 9, 2024.

4 2. The Court continue the Final Pretrial Conference currently set for
5 January 12, 2024, at 10:30 a.m., to March 8, 2024, at 10:30 a.m.

6 **IT IS SO STIPULATED.**

7 Dated: December 4, 2023

Respectfully submitted,

8 ROB BONTA
9 Attorney General of California
10 R. MATTHEW WISE
11 Supervising Deputy Attorney General
12 ANNA FERRARI
13 CHRISTINA R.B. LÓPEZ
14 Deputy Attorneys General

15 */s/ John D. Echeverria*

16 JOHN D. ECHEVERRIA
17 Deputy Attorney General
18 *Attorneys for Defendant Rob*
19 *Bonta, in his official capacity*

20 Dated: December 4, 2023

MICHEL & ASSOCIATES, P.C.

21 */s/ Sean A. Brady*

22 SEAN A. BRADY
23 *Attorneys for Plaintiffs*
24
25
26
27
28

ATTESTATION OF E-FILED SIGNATURES

I, John D. Echeverria, am the ECF User whose ID and password are being used to file the foregoing STIPULATION AND JOINT REQUEST TO CONTINUE PRETRIAL DEADLINES. Pursuant to Local Rule 5-4.3.4(a)(2), I hereby attest that all signatories concur in the filing's content and have authorized the filing.

Dated: December 4, 2023

/s/ John D. Echeverria

John D. Echeverria
Deputy Attorney General